IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

(1)	MARGIE M. ROBINSON, as the)
	Personal Representative of the Estate)
	of Christina Dawn Tahhahwah,)
	Deceased,)
	Plaintiff,)
vs.) Case No. CIV-16-869-F
(1)	THE CITY OF LAWTON,)
` ,	OKLAHOMA et al.,)
)
	Defendants.)

<u>PLAINTIFF'S UNOPPOSED MOTION TO REDACT PORTIONS OF THE SETTLEMENT AGREEMENT</u>

Plaintiff Margie M. Robinson, as the Personal Representative of the Estate of Christina Dawn Tahhahwah, Deceased, and submits the following Unopposed Motion to Redact Portions of the Settlement Agreement. In support thereof, Robinson would show the Court as follows:

- 1. The parties have prepared and executed a Joint Application for Agreed Judgment that is ready to be filed with the Court. The parties' Settlement Agreement is attached as Exhibit "A" to the proposed Agreed Judgment.
- 2. The Settlement Agreement executed by the parties, Paragraph 9, contains the name of a minor child as well as the structured settlement distribution schedule to the minor child. Plaintiff is required to redact or conceal the name of a minor child pursuant to the ECF Policies and Procedures Manual, § II(H)(1), and the Federal Rules of Civil Procedure. Furthermore, the terms of the structured settlement distribution schedule to the minor child

are private and confidential, and do not involve an obligation of the City of Lawton, but rather the private obligation of the structured settlement company to the minor child.¹

- 3. Plaintiff respectfully requests that the Court attach to the proposed Agreed Judgment a redacted copy of the Settlement Agreement, where Paragraph 9 is redacted in its entirety for the reasons set forth in ¶ 2, above. Plaintiff will provide to the Court both an unredacted and redacted copy of the Settlement Agreement for consideration and review.
- 4. Plaintiff is authorized to state that Defendant The City of Lawton (signatory to the Settlement Agreement) does not oppose the relief requested in this Motion.
- 5. Plaintiff has submitted a proposed Order in accordance with ECF Policies and Procedures.

Dated this 20th day of December, 2018.

WARD & GLASS, L.L.P.

/s/ Barrett T. Bowers

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CERTIFICATE OF SERVICE

¹ The distribution schedule identifies dates when the minor child will receive the settlement proceeds. At the time of the distribution, the child will no longer be a minor.

This is to certify that on this $\underline{20th}$ day of December, 2018, a true and correct copy of the above has been delivered via ECF to all attorneys of record.

Kelea L. Fisher Clay Hillis

s/Barrett T. Bowers